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October 11, 2024

VIA ECOURTS

The Honorable Zahid N. Quraishi, U.S.D.J.
U.S. Courthouse
402 East State Street, Room 4000
Trenton, NJ 08608

**Re: Andy Kim, *et al* v. Christine Giordano Hanlon, in her official capacity as
Monmouth County Clerk, *et al*
UNITED STATES DISTRICT COURT
Case No. 3:24-cv-1098-ZNQ-TJB**

Dear Judge Quraishi:

We represent the Somerset County Clerk in the above captioned matter. We understand the parties are to submit a joint status update on the position of settlement and may submit a separate ex parte submission to the Court. This is our separate ex parte submission. We have conferred with Brett Pugach, Esq. in regard to the joint status letter. This responds to the request for a status update to be submitted to the Court on the status of settlement discussions.

The Somerset County Clerk will confer with the Somerset County Board of Commissioners about settlement and funding of any settlement. Our recommendation will be to enter into a proposed settlement.

The next meeting of the Somerset County Board of Commissioners is scheduled for October 22, 2024. If funding of the settlement is approved by the Commissioners, it would take about 30 days for funds to be made available to cover Defendant Somerset County's share of the settlement fees.

Also the Plaintiffs must provide the basis for the amount of the fees demanded as a prerequisite to any settlement.

In light of the above we respectfully request the Court to delay discovery and other action for the period needed for the Somerset County Clerk to proceed as noted above.

Respectfully submitted,

/s/ Gordon J. Golum, Esq.

GORDON J. GOLUM, ESQ.

Counsel for the Somerset County Clerk

Request for a temporary stay of discovery as to the Somerset County Clerk is GRANTED. Counsel to file a letter no later than 10/25/2024 advising as to the decision of the Somerset County Board of Commissioners.

So Ordered this 11th day of October 2024.



ZAHID N. QURAISHI

UNITED STATES DISTRICT JUDGE